

Brister, Bob
Page 1 of 2

----- Forwarded by Susan K Kozacek/R3/USDAFS on 10/15/2003
12:55 PM -----brister@greens.org 10/09/2003 08:48 PM

To: skozacek@fs.fed.us
cc:
Subject: Environmental Impact Statement for Tucson Electric
Power's proposed 345 kilovolt powerline

Ms. Sue Kozacek
Coronado National Forest
Federal Building, 300 West Congress
Tucson, AZ 85701

Dear Ms. Kozacek,

1 I am a former resident of Arizona and I believe that ecological
protection and restoration are the highest and best use of our
public lands. I am writing to urge you to withdraw the current
draft Environmental Impact Statement for Tucson Electric Power's
proposed 345 kilovolt powerline.

2 TEP's proposed "Western Route" and alternative "Crossover Route"
would carve through some of the most remote and wild areas in
Southeast Arizona, forever scarring the beautiful and irreplaceable
landscape of the Tumacacori Highlands. This area contains several
roadless areas as well as a citizen's proposed Wilderness area home
to black bears, Mexican spotted owls, lesser-long nosed bats and
peregrine falcons as well as lesser known species such as the Sonora
chub, Mexican vine snake, elegant trogon and the Gentry indigo
bush. A jaguar was sighted in this area only two years ago.

3 The important goal of providing fully reliable electrical service to the
city of Nogales and Santa Cruz County must be achieved.
Unfortunately, instead of building the small transmission line
necessary to achieve this goal, TEP has proposed a massive,
environmentally destructive, and extremely controversial powerline
designed to export power to Mexico.

Comment No. 1

The Federal agencies note the commentor's opinion that ecological protection and restoration are the "highest and best use of our public lands."

Comment No. 2

Sections 3.1 and 4.1 describe existing land use resources and analyze potential impacts to these resources, including potential impacts to the Tumacacori Mountains and the Tumacacori EMA of the Coronado National Forest.

Sections 3.1, Land Use, and 3.12, Transportation, discuss the IRAs within the Coronado National Forest. Sections 4.1, Land Use, and 4.12, Transportation, evaluate potential impacts to IRAs.

Section 5.2.4 acknowledges the citizen-initiated proposal for an addition to the National Wilderness Preservation System.

Sections 3.3 and 4.3 discuss the existing biological resources and analyze the potential impacts to these resources from the proposed project, including potential impacts to wildlife.

Comment No. 3

TEP's purpose and need for the proposed project, as provided to DOE in TEP's Presidential Permit Application, is "...to construct a double-circuit 345 kV, alternating current transmission line to interconnect the existing electrical systems of TEP and Citizens Utilities ("Citizens") in Nogales, Arizona, with a further interconnection to be made from Nogales, Arizona to the CFE transmission system...." When a Federal agency is evaluating a request for a permit for a proposed action developed by a non-Federal applicant (e.g., TEP), CEQ has opined that Federal agencies should select alternatives which are feasible given the applicant's stated goals and reflect the "common sense realities" of the situation. Therefore, the Federal agencies are evaluating the proposed project presented by TEP to each of the Federal agencies (see Section 1.2.2, Federal Agencies' Purpose and Need Statements).

Brister, Bob
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4 The draft EIS is clearly inadequate, because it does not address important alternatives to TEP's powerline which would provide reliable service without destroying our environmental and cultural heritage, and which would not require huge increases to consumers' electricity bills.

5 The recent blackout in the Northeast is an urgent reminder that our energy policy should be based on serving the public interest, not corporate private profits. I urge DOE to issue a new draft EIS which fully and rigorously explores all available options-including a local power plant and smaller power lines which would not serve Mexico-to meet the important public interest of providing reliable energy service to Santa Cruz County.

Sincerely,

Bob Brister
1102 South 800 East #A
Salt Lake City, Utah 84105

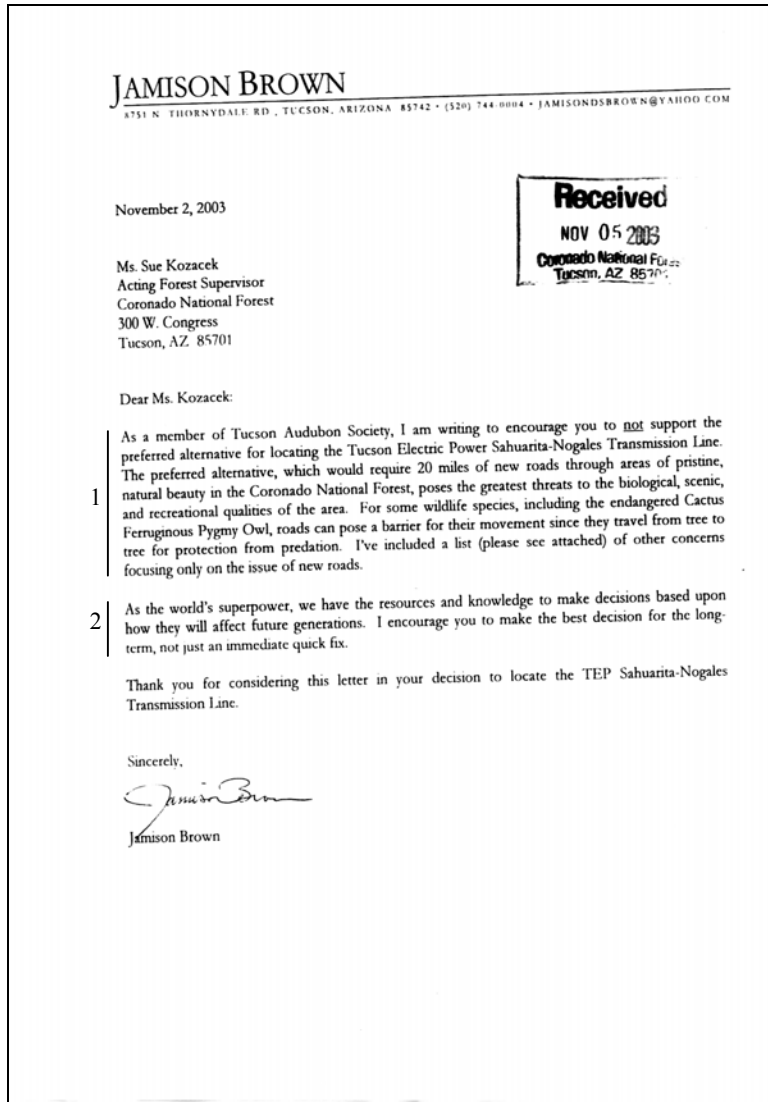
Comment No. 4

Section 1.2 of the Final EIS explains the roles of the Federal agencies in developing alternatives for the proposed project. Where an applicant seeks a permit for a particular business project, such as the case with TEP's proposed project, the Federal agencies generally limit their review of alternatives to those that would satisfy the applicant's proposal and decide whether that proposal is or is not worthy of receiving a permit. The Federal agencies do not review alternatives that are not within the scope of the applicant's proposal. Similarly, the agencies do not direct the applicant to alter its proposal; instead, the agencies decide whether a permit is appropriate for the proposal as the applicant envisions it. It is not for the agency to run the applicant's business and to change the applicant's proposal, but only to evaluate the environmental effects of the applicant's business proposal as offered. Accordingly, the EIS evaluates a reasonable range of alternatives, which include the full spectrum of alternatives that would satisfy the applicant's proposal.

Comment No. 5

A new power plant in Nogales is not a viable alternative to a new, second transmission line (part of TEP's proposal). Therefore, the alternative of a new power plant is not evaluated in detail in this EIS. Likewise, a smaller transmission line in lieu of the proposed 345-kV line would not meet the international interconnection aspect of TEP's proposal, and therefore is not evaluated in detail in this EIS. (Refer also to Section 2.1.5, Alternatives Considered But Eliminated From Further Analysis.)

Brown, Jamison
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Comment No. 1

Sections 3.11 and 4.11 present a description of the existing transportation network and analyze the potential impacts of the existing and new roads from the proposed project, including roads on the Coronado National Forest.

Sections 3.3 and 4.3 present a description of the existing biological resources and analyze the potential impacts to these resources from the proposed project. Section 4.3.3, Special Interest Species, specifically addresses potential impacts to Cactus Ferruginous Pygmy Owl including impacts from modification of habitat.

Sections 3.2 and 4.2 present a description of the existing visual resources and analyzes the potential impacts to these resources from the proposed project. Sections 3.1.2 and 4.1.2 present description of the existing recreational opportunities and analyze the potential impacts to these resources from the proposed project.

Comment No. 2

Section 1.6.6 of the Final EIS states that each Federal agency will make and explain its decision in its respective ROD.

Comment No. 3

All unnecessary project roads (those that are not required for ongoing maintenance of the project) would be closed following construction (see Section 4.12, Transportation) such that access to new roads would be limited to an occasional TEP maintenance vehicle. This would limit an increase in use of the area by humans, and limit effects from passing vehicles such as airborne dust generation. Chapter 4, Environmental Effects, analyzes the potential impacts from roads associated with the project for each resource area.

Brown, Jamison
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3

1. Mortality from road construction

The actual construction of a road, from clearing to paving, will often result in the death of any sessile or slow-moving organisms in the path of the road. Obviously, trees and any other vegetation will be removed, as well as any organisms living in that vegetation.

2. Mortality from collisions with vehicles

Roadkill is the greatest directly human-caused source of wildlife mortality throughout the U.S. More than a million vertebrates are killed on our roadways every day.

3. Modification of animal behavior

The presence of a road may cause wildlife to shift home ranges, and alter their movement pattern, reproductive behavior, escape response and physiological state. When roads act as barriers to movement, they also bar gene flow where individuals are reluctant to cross for breeding.

4. Alteration of the physical environment

A road transforms the physical conditions on and adjacent to it, creating edge effects with consequences that extend beyond the white lines. Roads alter the following physical characteristics of the environment:

- a. **Soil density** - Soil becomes compacted and remains so long after a road is in use.
- b. **Temperature** - Dark pavement absorbs radiant heat and releases it at night, creating a "heat island" around roads. This can attract heat-seeking species such as birds and snakes to roads, increasing their mortality by vehicle collision.
- c. **Soil water content** - Porosity of soil is reduced, allowing for less absorption of water.
- d. **Light** - In order for a road to be built, trees must be cleared. Without the protective shade of the canopy, the area is exposed to more sunlight and inviting to light-loving species that otherwise would not thrive there.
- e. **Dust** - Passing cars will stir up dust from the road. Dust will settle on nearby plants, blocking photosynthesis. Amphibians, such as frogs and salamanders, are also affected by traffic dust.
- f. **Surface water flow** - Roads are impermeable, and act as channels to redirect water flow, including sediments and nutrient flow.
- g. **Pattern of run-off** - Roads are often built with parallel ditching, which diverts rainwater run-off along roadways, rather than the natural flow pattern.
- h. **Sedimentation** - Roads act to route fine sediments into streams.

5. Spread of exotics

Roads provide opportunities for invasive species by:

- a. providing habitat by altering conditions;
- b. stressing or removing native species; and
- c. allowing easier movement by wild or human vectors.

6. Increased use of areas by humans

Roads facilitate increased human access to formerly remote areas. In addition to the additional disturbance and pollution often associated with heavy human access, roads increase the likelihood and efficiency with which natural resources can be extracted.

**adapted from "Review of Ecological Effects of Roads on Terrestrial and Aquatic Communities," by Stephen C. Trombulak and Christopher A. Prussell. Conservation Biology, Pages 18-30, Volume 14, No. 1, February 2000.*

Comment No. 3 (continued)

Section 4.3.2, Vegetation and Wildlife, has been revised in the Final EIS to state that mortality from collisions with vehicles is possible, although the number of collisions would be minimal because of the limited access to new roads. Section 4.3.2 addresses the possibility of wildlife mortality from any disturbance including road construction, and disturbance to vegetation and wildlife (e.g., interference with breeding). Any new roads would not be paved, and therefore, would not create a "heat island" as cited by the commentor. Also, vegetation in the area is generally short such that the clearing of a tree canopy as cited by the commentor is not applicable.

Sections 3.6.2 and 4.6.2 present a description of the existing soils and analysis of the potential impacts to soils, including soil density, sedimentation, and erosion impacts, and the use of water bars and rolling dips to divert water off the roads.

Sections 3.3.6 and 4.3.6 discuss existing invasive species and evaluate potential invasive species impacts from the proposed project.

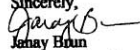
Brun, Janay
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October 11, 2003

Dr. Jerry Pell,

1 I am writing in regard to the Tucson Electric Power Sahuarita-Nogales Transmission
line DEIS. As a volunteer for several local wildlife organizations, I spend much time in
the open, vast wilderness that is a proposed site for the TEP powerline. Change venues.
2 This area is home to such a diverse population of animals, birds, and fauna that the risk of
extinction is viable in such a case as the sonoran jaguar. I understand that a smaller, less
obtrusive 115kv powerline was not considered for any route. Why not? I do not support
3 the proposed routes because they do not serve Santa Cruz County's interests, as originally
intended under ACC order 62011. They are an unnecessary economic, environmental,
and cultural burden on southern Arizona. Please withdraw this Draft Environmental
Impact Statement and issue a new assessment that properly analyzes real solutions to
power needs in Santa Cruz County and includes a smaller powerline and/or locally run
power plant.

Sincerely,


Janay Brun
1030 E. Miles St.
Tucson, AZ 85719

Comment No. 1

Section 1.2 of the Final EIS explains the roles of the Federal agencies in developing alternatives for the proposed project. Where an applicant seeks a permit for a particular business project, such as the case with TEP's proposed project, the Federal agencies generally limit their review of alternatives to those that would satisfy the applicant's proposal and decide whether that proposal is or is not worthy of receiving a permit. The Federal agencies do not review alternatives that are not within the scope of the applicant's proposal. Similarly, the agencies do not direct the applicant to alter its proposal; instead, the agencies decide whether a permit is appropriate for the proposal as the applicant envisions it. It is not for the agency to run the applicant's business and to change the applicant's proposal, but only to evaluate the environmental effects of the applicant's business proposal as offered. Accordingly, the EIS evaluates a reasonable range of alternatives, which include the full spectrum of alternatives that would satisfy the applicant's proposal.

Sections 3.3 and 4.3 discuss the existing biological resources and analyze the potential impacts to these resources from the proposed project, including potential impacts to jaguar.

Comment No. 2

ACC Decision No. 62011 (ACC 1999) mandates the construction of a second transmission line to serve customers in Santa Cruz County, and does not reference the export of electricity to Mexico. However, TEP's stated purpose and need for the proposed project has a dual purpose to benefit both southern Arizona and Mexico.

Comment No. 3

A new power plant in Nogales is not a viable alternative to a new, second transmission line (part of TEP's proposal). Therefore, the alternative of a new power plant is not evaluated in detail in this EIS. Likewise, a smaller transmission line in lieu of the proposed 345-kV line would not meet the international interconnection aspect of TEP's proposal, and therefore is not evaluated in detail in this EIS. (Refer also to Section 2.1.5, Alternatives Considered But Eliminated From Further Analysis.)

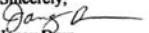
Brun, Janay
Page 1 of 1

October 11, 2003

Ms. Sue Kozacek,

1 I am writing in regard to the Tucson Electric Power Sahuarita-Nogales Transmission
line DEIS and needed Forest Plan Amendments. I enjoy my wildlife volunteer activities
in the area and I am appalled that the Tumacacori and Atascosa Mountains were even
2 considered due to the abundance of threatened and endangered species in the area. I urge
you to deny any special use permits for the Western and Crossover Routes because these
plans are not compatible with the current uses of the affected area. Preserve this area,
don't destroy it and its inhabitants.

Sincerely,


Janay Brun
1030 E. Miles St.
Tucson, AZ 85719

Comment No. 1

Sections 3.3 and 4.3 present a description of the existing biological resources and analyze the potential impacts to these resources from the proposed project, including potential impacts to threatened and endangered species.

Comment No. 2

Sections 3.1 and 4.1 present a description of the existing land use and analyze the potential impacts to these resources from the proposed project.

Brunner, J. Robert
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(1)

received
9 SEPT 03

8/21/03

Dept. of Energy
% Mr. Jerry Bell Comments

Dear Dr. Bell:

Thank you for sending me the Summary
Rpt. on the TEP Transmission Line Proposal.
Several items give me concern:

- 1 a) TEP releases PR to the extent that
they already have permission to build their
line and are being delayed by events out
of their control.
- 2 b) TEP has purchased Citizens' Comm.,
gas and electric divisions so the
court order for Citizens to obtain
additional power seems moot.
- 3 c) A group in Nogales want to
take over the Citizens facilities and
provide power for the area. In fact
there will be a public vote on this in
the near future. Also, it would be
more logical ~~for~~ to construct generating
- 4 capacity in Nogales than to run a
costly line from Sahuarita.
- 5 d) In my opinion, TEP wants to
sell power to Mexico above all other
reasons and wants the rate payers of
Nogales to foot the bill of construction.

Comment No. 1

The Federal agencies assume that the commentator's reference to PR means public relations. The issuance or content of TEP's public relations material is beyond the scope of the EIS.

Comment No. 2

The ACC is vested with the state's authority to decide how it believes energy should be furnished within Arizona's borders (for example, the need for and effectiveness of transmission lines within its borders). Refer to Section 1.1.2, The Origin of TEP's Proposal: TEP's Business Plan and the Proceedings of the Arizona Corporation Committee, that explains the relationship between TEP and Citizens, the jurisdictions and authorities of the state and Federal agencies, and the ACC's requirements of TEP.

Comment No. 3

As explained in Section 2.1.5, local generation and/or improvements to the Citizens distribution system do not eliminate the need for the proposed second transmission line.

Comment No. 4

A new power plant in Nogales is not a viable alternative to a new, second transmission line (part of TEP's proposal). Therefore, the alternative of a new power plant is not evaluated in detail in this EIS (refer also to Section 2.1.5, Alternatives Considered But Eliminated From Further Analysis).


Brunner, J. Robert
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(2)

6 e) To my recollection, there is a group in Mexico who ~~do~~ want to build generating capacity to supply Nogales, Sonora. Why not encourage them to do so by protecting their markets. Heaven only knows how much this area needs investments and jobs.

7 In general, the TEP proposal is a flawed idea and not in keeping with the contemporary situation. I strongly oppose the project.

J.R. Brunner



Dr. J Robert Brunner
997 W Camino Tierra Libre
Green Valley, AZ
85614-2860
WE SUPPORT OUR TROOPS

Comment No. 5

TEP's purpose and need for the proposed project, as provided to DOE in TEP's Presidential Permit Application, is "...to construct a double-circuit 345 kV, alternating current transmission line to interconnect the existing electrical systems of TEP and Citizens Utilities ("Citizens") in Nogales, Arizona, with a further interconnection to be made from Nogales, Arizona to the CFE transmission system...."

If TEP's proposed project is approved by each of the Federal agencies, then there would still be a variety of events that could preclude TEP from implementing this project, such as the possibility of failure by TEP to secure a power sales contract with CFE. Issuance of a Presidential Permit by DOE would only indicate that DOE has no objection to the project, but would not mandate that the project be built.

Because the Federal agencies cannot anticipate how the ACC may adjust consumer electricity rates in light of the proposed project, the potential change in consumer electricity rates is too speculative for inclusion in the EIS.

Comment No. 6

Regarding the trade of electricity across the U.S-Mexico border, the passage of NAFTA established the benefits of strengthening and enhancing the electricity trade with Canada and Mexico. Note also that power plant construction in Nogales, Sonora is not reasonably foreseeable (see Section 5.2, Reasonably Foreseeable Action Identification.)


Comment No. 7

The commentor's opposition to the proposed project is noted.

Brunner, J. Robert
Page 1 of 1

Comment No. 1

A new power plant is not a viable alternative to a new, second transmission line (part of TEP's proposal). Therefore, the alternative of a new power plant is not evaluated in detail in this EIS (refer also to Section 2.1.5, Alternatives Considered But Eliminated From Further Analysis).

 **DON'T FORGET**
A note from...
J. Robert Brunner

J. R. Brunner

You will note that there is a lot of sound opposition to the TEP project. Why not encourage local enterprise instead of outside megacorps stealing the show.

Also, there are parties in Mexico interested in providing local power generation.

J. R. Brunner

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Brydolf, Libby
Page 1 of 2

Forwarded by Susan K Kozacek/R3/USDAFS on
10/16/2003 05:22 PM -----
lbrydolf@hotmail.com
10/10/2003 12:42 PM
To: skozacek@fs.fed.us
cc:
Subject: Environmental Impact Statement for Tucson
Electric Power's proposed 345 kilovolt powerline
Ms. Sue Kozacek Coronado National Forest Federal
Building, 300 West Congress Tucson, AZ 85701

Dear Ms. Kozacek,

1 I am writing to urge you to withdraw the current draft
Environmental Impact Statement for Tucson Electric
Power's
proposed 345 kilovolt powerline.

2 I believe a smaller, less invasive line would serve the needs
of citizens of Arizona and nearby Mexican communities
without cutting through some of the most remote and wild
areas in Southeast Arizona.

3 This area contains several roadless areas as well as a
citizen's proposed Wilderness area home to black bears,
Mexican spotted owls, lesser-long nosed bats and peregrine
falcons as well as lesser known species such as the Sonora
chub, Mexican vine snake, elegant trogon and the Gentry
indigo bush. A jaguar was
sighted in this area only two years ago.

Comment No. 1

The commentor's opinion that the Draft EIS should be withdrawn is noted.

Comment No. 2

TEP's purpose and need for the proposed project, as provided to DOE in TEP's Presidential Permit Application, is "...to construct a double-circuit 345 kV, alternating current transmission line to interconnect the existing electrical systems of TEP and Citizens Utilities ("Citizens") in Nogales, Arizona, with a further interconnection to be made from Nogales, Arizona to the CFE transmission system located in Sonora, Mexico." When a Federal agency is evaluating a request for a permit for a proposed action developed by a non-Federal applicant (e.g., TEP), CEQ has opined that Federal agencies should select alternatives which are feasible given the applicant's stated goals and reflect the "common sense realities" of the situation. Therefore, the Federal agencies are evaluating the proposed project presented by TEP to each of the Federal agencies (see Section 1.2.2, Federal Agencies' Purpose and Need Statements).

A smaller transmission line in lieu of the proposed 345-kV line would not meet the capacity requirements of TEP's proposal, and therefore is not evaluated in detail in this EIS (refer also to Section 2.1.5, Alternatives Considered But Eliminated From Further Analysis).

Comment No. 3

Sections 3.1, Land Use, and 3.12, Transportation, discuss the IRAs within the Coronado National Forest. Sections 4.1, Land Use, and 4.12, Transportation, evaluate potential impacts to IRAs.

Section 5.2.4 acknowledges the citizen-initiated proposal for an addition to the National Wilderness Preservation System.

Brydolf, Libby
Page 2 of 2

2
cont.

The important goal of providing fully reliable electrical service to the city of Nogales and Santa Cruz County must be achieved. Unfortunately, instead of building the small transmission line necessary to achieve this goal, TEP has proposed a massive, environmentally destructive, and extremely controversial powerline designed to export power to Mexico.

4

The draft EIS is clearly inadequate, because it does not address important alternatives to TEP's powerline which would provide reliable service without destroying our environmental and cultural heritage, and which would not require huge increases to consumers' electricity bills.

5

The recent blackout in the Northeast is an urgent reminder that our energy policy should be based on serving the public interest, not corporate private profits. I urge DOE to issue a new draft EIS which fully and rigorously explores all available options-including a local power plant and smaller power lines which would not serve Mexico-to meet the important public interest of providing reliable energy service to Santa Cruz County.

Sincerely,

Libby Brydolf
2419 Bancroft St.
San Diego, California 92104

Comment No. 3 (continued)

Sections 3.3 and 4.3 discuss the existing biological resources and analyze the potential impacts to these resources from the proposed project, including potential impacts to wildlife.

Comment No. 4

Section 1.2 of the Final EIS explains the roles of the Federal agencies in developing alternatives for the proposed project. Where an applicant seeks a permit for a particular business project, such as the case with TEP's proposed project, the Federal agencies generally limit their review of alternatives to those that would satisfy the applicant's proposal and decide whether that proposal is or is not worthy of receiving a permit. The Federal agencies do not review alternatives that are not within the scope of the applicant's proposal. Similarly, the agencies do not direct the applicant to alter its proposal; instead, the agencies decide whether a permit is appropriate for the proposal as the applicant envisions it. It is not for the agency to run the applicant's business and to change the applicant's proposal, but only to evaluate the environmental effects of the applicant's business proposal as offered. Accordingly, the EIS evaluates a reasonable range of alternatives, which include the full spectrum of alternatives that would satisfy the applicant's proposal.

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